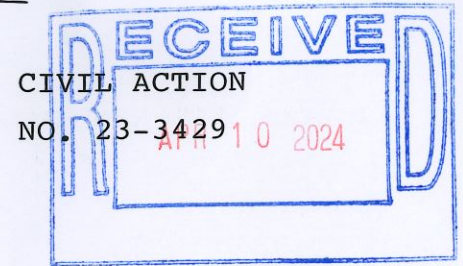


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

RICHARD LAIRD

V.

J. TERRA, WYNDER, HENSLEY, ALL  
PROGRAM REVIEW MEMBERS AT SCI-PHOENIX, DR.  
LAUREL HARRY



MOTION FOR APPOINTMENT OF COUNSEL

PURSUANT TO 28 U.S.C. §1915(e)(1) PLAINTIFF MOVES FOR AN ORDER APPOINTING COUNSEL TO REPRESENT HIM IN THIS CASE. IN SUPPORT OF THIS MOTION, PLAINTIFF STATES:

1. PLAINTIFF IS UNABLE TO AFFORD COUNSEL. HE HAS REQUESTED LEAVE TO PROCEED IN FORMA PAUPERIS. IN FORMA PAUPERIS STATUS HAS BEE GRANTED BY THE COURT.

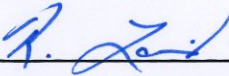
2. PLAINTIFFS IMPRISONMENT WILL GREATLY LIMIT HIS ABILITY TO LITIGATE. THE ISSUES IN THIS CASE ARE COMPLEX AND WILL REQUIRE SIGNIFICANT RESEARCH AND INVESTIGATION. DEPOSITIONS WILL BE REQUIRED FROM DEFENDANTS, AND OTHERS. PLAINTIFFS ACCESS TO THE NECESSARY LEGAL REFERENCE MATERIALS, RESEARCH MATERIALS IS GREATLY RESTRICTED. PLAINTIFF HAS A LIMITED KNOWLEDGE OF THE LAW.

3. A TRIAL IN THIS CASE WILL LIKELY INVOLVE CONFLICTING TESTIMONY, AND COUNSEL WOULD BETTER ENABLE PLAINTIFF TO PRESENT EVIDENCE AND CROSS EXAMINE WITNESSES.

4. PLAINTIFF HAS, IN GOOD FAITH, MADE SEVERAL ATTEMPTS TO OBTAIN A LAWYER. PLAINTIFF HAS REQUESTED REPRESENTATION FROM THE ACLU OF PENNSYLVANIA. THE PENNSYLVANIA INSTITUTIONAL LAW PROJECT. THE ABOLITIONIST LAW CENTER. THIS REQUEST FOR REPRESENTATION HAS BEEN MADE ON MULTIPLE OCCASIONS. PLAINTIFF HAS REQUESTED THAT THE ATTORNEYS HANDLING HIS CRIMINAL CASE REFER HIM ANY ATTORNEY THAT MAY BE WILLING

TO REPRESENT IN THIS CASE. AS OF THIS DATE PLAINTIFF HAS BEEN UNABLE TO RETAIN REPRESENTATION FOR THIS CASE.

WHEREFORE, PLAINTIFF REQUESTS THAT THE COURT APPOINT COUNSEL TO REPRESENT HIM IN THIS CASE.

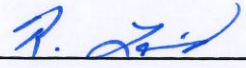
s/   
RICHARD LAIRD #AT0811  
SCI-SOMERSET  
1600 WATERS RUN ROAD  
SOMERSET PA 15510

4-2-24  
DATE



VERIFICATION

I HAVE READ THE FOREGOING MOTION FOR APPOINTMENT OF COUNSEL AND HEREBY VERIFY, UNDER THE PENALTY OF PERJURY THAT THE MATTERS ALLEGED THEREIN ARE TRUE AND CORRECT TO THE BEST OF MY PERSONAL KNOWLEDGE.

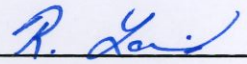
s/   
RICHARD LAIRD

4-2-24  
DATE

CERTIFICATE OF SERVICE

PLAINTIFF HEREBY CERTIFIES THAT A TRUE AND CORRECT COPY OF THE FOREGOING HAS BEEN SERVED UPON THE FOLLOWING BY FIRST CLASS MAIL:

1. MATTHEW SKOLNIK  
1600 ARCH STREET, STE. 300  
PHILADELPHIA PA 19103

s/   
RICHARD LAIRD

4-2-24  
DATE

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

RICHARD LAIRD

V.

J.TERRA,WAYNER,HENSLEY,ALL  
PROGRAM REVIEW MEMBERS AT SCI-PHOENIX

CIVIL ACTION

NO. 23-3429

ORDER

AND NOW, THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2024 IT IS ORDERED THAT  
\_\_\_\_\_ IS APPOINTED TO REPRESENT PLAINTIFF IN THIS  
CIVIL ACTION.

BY THE COURT:

\_\_\_\_\_.

Smart Communications/PADOC

SCI- SOMERSET

Name R. LAIRD

Number AT0811

-PO-Box-33628

--St Petersburg FL 33733  
1600 WATERS MILL RD.  
SOMERSET PA 15510

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UNITED STATES DISTRICT COURT

PHILADELPHIA PA 19106-9865



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